

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

TRUSTEES OF THE LOCAL 7 TILE INDUSTRY
WELFARE FUND, TRUSTEES OF THE LOCAL 7
TILE INDUSTRY ANNUITY FUND, TRUSTEES OF
THE TILE LAYERS LOCAL UNION 52 PENSION
FUND, TRUSTEES OF THE BRICKLAYERS &
TROWEL TRADES INTERNATIONAL PENSION
FUND, AND TRUSTEES OF THE INTERNATIONAL
MASONRY INSTITUTE,

Plaintiffs,

-against-

EAQ CONSTRUCTION CORP., and TAJ MARBLE &
STONE, INC.,

Defendant.

14-cv-4097 (SJ)(CLP)

**NOTICE OF MOTION FOR
DEFAULT JUDGMENT**

TO THE CLERK OF THE COURT and COUNSELORS:

PLEASE TAKE NOTICE that upon the annexed declarations of Nicole Marimon, Esq., dated October 6, 2015, and Christopher Guy, dated October 6, 2015, and Terry Vouvoudakis, dated October 6, 2015, and the exhibits annexed thereto, and upon all pleadings and proceedings heretofore had herein, the undersigned, on behalf of the plaintiffs, will move this Court before the Honorable Sterling Johnson, Jr., United States District Court Judge, at the United States Courthouse, Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by the Court, for an Order granting plaintiffs' renewed motion for default judgment, and for such other and further relief as the Court deems proper and just.

Dated: New York, New York
October 6, 2015

Respectfully submitted,
VIRGINIA & AMBINDER, LLP

By: _____/s/_____

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